

REMARKS

Reconsideration of the present application is respectfully requested.

Claims 20 and 21 stand rejected under 35 U.S.C. §102(e) over Takayuki. Applicant respectfully disagrees since it does not appear as if Takayuki is covered under 35 U.S.C. §102(e) since it is neither a U.S. Patent Application nor a U.S. Patent. Therefore, Applicant respectfully requests that the outstanding rejections under §102(e) be withdrawn.

In an effort to prevent Applicant's claims from being misread onto Takayuki, Claim 20 has been amended to make it clear that the piezoelectric device is inoperable to move the moveable element. Applicant respectfully asserts that there is no fair way to read Claim 20 onto the subject matter of Takayuki. Therefore, Applicant respectfully requests that the outstanding §102(e) rejections based upon Takayuki be withdrawn.

Claims 27-29 stand rejected under 35 U.S.C. §103(a) over Takayuki. Although Applicant respectfully disagrees, Claim 27 has been amended to make it clear that the piezoelectric device is inoperable to move the moveable element. Since Takayuki neither shows one nor many spring biased mechanisms as required by Applicant's claims, Applicant respectfully requests that the outstanding §103(a) rejections be withdrawn.

With regard to Claim 28, it should have been allowable over and above the reasons set forth with regard to Claim 27 as there is no way to fairly characterize multiple mechanisms on a single electrical circuit as being mere duplications of working parts involving routine skill. In other words, while it arguably only involves routine skill to duplicate an

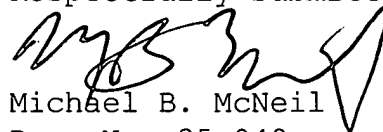
electronic mechanism on a separate electrical circuit, it requires far more than routine skill to duplicate the electrical mechanism while maintaining a single electrical circuit as required by Claim 28. Therefore, Applicant respectfully requests that the outstanding \$103(a) rejection be withdrawn over and above the reasons set forth with regard to Claim 27.

Claims 24-26 stand allowed. Claims 22-23 and 30-31 stand objected to as being dependent upon a rejected base claim. In response, applicants have amended Claims 22 and 30 into independent form. Therefore, applicants now respectfully request that Claims 22-23 and 30-31 now be shown as allowable. Applicants appreciate the indication of allowable subject matter. A check in the amount of \$172.00 is included herewith to cover the excess independent claim fees. The Commissioner is authorized to charge any underpayment or credit any overpayment to deposit account number 500226.

Applicants have added new Claims 32 and 33 which are believed allowable over the art of record.

This application is now believed to be in condition for allowance of claims 20-33. However, if the Examiner believes that some minor additional clarification would put this application in even better condition for allowance, the Examiner is invited to contact the undersigned attorney at (812) 333-5355 in order to hasten the prosecution of this application.

Respectfully Submitted,



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